

IN THE UNITED STATES BANKRUPTCY COURT
THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	
KATHY J. EARNEST,)	Chapter 13
)	
Debtor.)	Case No.: 21-20703-GLT
_____)	
)	
BOROUGH OF WEST MIFFLIN AND)	
WEST MIFFLIN AREA SD,)	
)	
Movant,)	
v.)	
)	
KATHY J. EARNEST,)	
)	
Respondent.)	

WITHDRAWAL OF PROOF OF CLAIM #2-1

AND NOW, comes the Borough of West Mifflin and West Mifflin SD, secured creditor in the above-referenced Bankruptcy case, by and through its Counsel, Jeffrey R. Hunt, Esquire and GRB Law, and hereby file its withdrawal of Proof of Claim #2-1 filed on May 20, 2021, in the amount of \$5,623.20 for delinquent earned income taxes for the tax years 2012-2014. The within Claim is being withdrawn because the Debtor has filed tax returns for 2012, 2013 and 2014 showing no income earned by Debtor for the years in question (2012, 2013 and 2014). Further, the earned income taxes that were due for the time period in question are attributable to income earned by Debtor's deceased husband.

Date: February 8, 2022

Respectfully Submitted,

GRB LAW

By: /s/ Jeffrey R. Hunt
Jeffrey R. Hunt, Esquire
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Pittsburgh, PA 15219
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Attorney for Movant
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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the foregoing WITHDRAWAL OF PROOF OF CLAIM #2-1 has been served this 8th day of February, 2022 by first-class United States mail, postage prepaid, upon:

Shawn N. Wright, Esquire
7240 McKnight Road
Pittsburgh, PA 15237

Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Ronda J. Winnecour, Esquire
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

GRB Law,

/s/ Jeffrey R. Hunt

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